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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10  
11 UNITED STATES OF AMERICA,

2:20-MC-00301-WBS-CKD

12 Plaintiff,

13 v.

14 APPROXIMATELY \$42,687.68 SEIZED  
FROM WELLS FARGO BANK  
15 ACCOUNT NUMBER 320-3742212,

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

16 APPROXIMATELY \$1,840.42 SEIZED  
FROM WELLS FARGO BANK  
17 ACCOUNT NUMBER 517-7263489,

18 APPROXIMATELY \$629.84 SEIZED  
FROM WELLS FARGO BANK  
19 ACCOUNT NUMBER 532-7107099,

20 APPROXIMATELY \$143.04 SEIZED  
FROM WELLS FARGO BANK  
21 ACCOUNT NUMBER 530-4807349,

22 APPROXIMATELY \$50.08 SEIZED  
FROM WELLS FARGO BANK  
23 ACCOUNT NUMBER 333-4403940, AND

24 APPROXIMATELY \$16,566.00 IN  
U.S. CURRENCY,

25 Defendants.

26  
27 It is hereby stipulated by and between the United States of America and potential claimants Pablo  
28 Salcedo Jr. and Karina Salcedo (“claimants”), by and through their respective counsel, as follows:

1       1. On or about September 16, 2020, claimants filed a claim in the administrative forfeiture  
2 proceeding with the Federal Bureau of Investigation with respect to the Approximately \$42,687.68 seized  
3 from Wells Fargo Bank Account Number 320-3742212, Approximately \$1,840.42 seized from Wells  
4 Fargo Bank Account Number 517-7263489, Approximately \$629.84 seized from Wells Fargo Bank  
5 Account Number 532-7107099, Approximately \$143.04 seized from Wells Fargo Bank Account Number  
6 530-4807349, Approximately \$50.08 seized from Wells Fargo Bank Account Number 333-4403940, and  
7 Approximately \$16,566.00 in U.S. Currency, (hereafter “defendant funds”), which were seized on or  
8 about June 18, 2020.

9       2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required  
10 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a  
11 claim to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants has  
12 filed a claim to the defendant funds as required by law in the administrative forfeiture proceeding.

13      3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
14 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are  
15 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture  
16 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.  
17 That deadline was December 15, 2020.

18      4. By Stipulation and Order filed December 15, 2020, the parties stipulated to extend to  
19 February 12, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
20 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
21 forfeiture.

22      5. By Stipulation and Order filed February 16, 2021, the parties stipulated to extend to April  
23 13, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
24 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

25      6. By Stipulation and Order filed April 13, 2021, the parties stipulated to extend to June 11,  
26 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
27 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

28      7. By Stipulation and Order filed June 11, 2021, the parties stipulated to extend to July 12,

1 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
2 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

3 8. By Stipulation and Order filed July 13, 2021, the parties stipulated to extend to September  
4 10, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
5 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

6 9. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
7 to October 8, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
8 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
9 forfeiture.

10 10. Accordingly, the parties agree that the deadline by which the United States shall be  
11 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment  
12 alleging that the defendant funds are subject to forfeiture shall be extended to October 8, 2021.

13 Dated: 9/9/2021

PHILLIP A. TALBERT  
Acting United States Attorney

14 By: /s/ Kevin C. Khasigian  
15 KEVIN C. KHASIGIAN  
16 Assistant U.S. Attorney

17 Dated: 9/9/2021

18 /s/ Melissa Dougherty  
19 MELISSA DOUGHERTY  
20 Attorney for potential claimants  
Pablo Salcedo Jr. and Karina Salcedo

21 (Signature authorized by email)

22  
23 **IT IS SO ORDERED.**

24 Dated: September 9, 2021

25   
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE